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BY ECF

## MEMO ENDORSED


January 14, 2021

Honorable Denise L. Cote  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Granted on the condition that the defendant and his family comply with all New York and New Jersey pandemic restrictions.

So Ordered: 1-17-20.

Re: *United States v. Zaquan McCutchen*  
Dkt. No.: 19-CR-275

  
DENISE COTE  
United States District Judge

Dear Judge Cote:

I am CJA counsel to Defendant Zaquan McCutchen in the above-referenced matter. I write to respectfully request that the Court modify Mr. McCutchen's conditions of release to permit him to travel to the District of New Jersey on Monday January 18, 2021.

Mr. McCutchen is seeking permission to take his daughter to the indoor amusement park at the American Dream Mall for her birthday. If permitted to travel, Mr. McCutchen would spend the day at One American Dream Way, East Rutherford, NJ 07073. He would be accompanied by his mother, daughter, girlfriend and siblings.

By way of background, Mr. McCutchen made his initial appearance on March 19, 2019 before the Honorable James L. Cott. Judge Cott ordered Mr. McCutchen's pretrial release on a \$250,000 personal recognizance bond, to be signed by six financially responsible people, home detention with electronic monitoring and travel restricted to the Southern and Eastern Districts of New York. On December 30, 2019, Your Honor modified Mr. McCutchen's condition of release from home detention with electronic monitoring to a curfew enforced by location monitoring, with the curfew hours to be set at the discretion of Pretrial Services. Mr. McCutchen has, at all times, remained compliant with all of the conditions of his release.

I have spoken with Pretrial Services, by Officer Jonathan Lettieri, and they have no objection to this request. The government, by Frank Balsamello, Esq., also has no objection.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone

Edward V. Sapone

cc: A.U.S.A. Frank Balsamello  
A.U.S.A. Matthew Hellman  
P.T.S.O. Jonathan Lettieri